

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE  
PLAYERS' CONCUSSION INJURY  
LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

THIS DOCUMENT RELATES TO:

**Hon. Anita B. Brody**

ALL ACTIONS

**DECLARATION OF DOUGLAS M. BURNS**

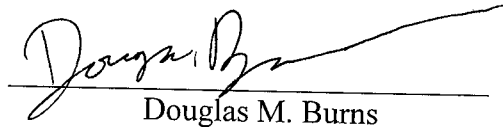
DOUGLAS M. BURNS declares pursuant to 28 U.S.C. § 1746:

1. I am an associate at the law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP ("Paul, Weiss"), counsel to Defendants National Football League and NFL Properties LLC (collectively, the "NFL Parties") in MDL No. 2323. I respectfully submit this declaration in support of the Response of the National Football League and NFL Properties LLC in Opposition to the Motion for Leave to Conduct Limited Discovery filed by Sean Morey, Alan Faneca, Ben Hamilton, Robert Royal, Roderick Cartwright, Jeff Rohrer and Sean Considine.

2. Attached as Exhibit A is a true and correct copy of the certified transcript of taped oral argument in the United States Court of Appeals for the Third Circuit in the matter of *In re: National Football League Players' Concussion Injury Litigation*, 14-8103 on September 10, 2014.

3. I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
October 2, 2014



Douglas M. Burns